

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

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*

Plaintiff,

v.

*** Case No. 1:17-CR-00106-CCB**

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JEMELL LAMAR RAYAM,

*

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Defendant.

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MOTION FOR PERMISSION FOR EXPEDITED ACCESS TO SEALED TRANSCRIPTS

NOW COMES Defendant, Jemell Lamar Rayam, through undersigned counsel, and moves this Court to grant access to the sealed transcript for the Re-arraignement hearing held on October 10, 2017 (**ECF 195**) and the Plea Agreement Supplement dated October 10, 2017 (**ECF 197**) in the above-referenced matter and, as grounds, states as follows:

1. Defendant has filed an appeal to the U.S. Court of Appeals for the Fourth Circuit in this matter at Case No. 19-4423. The undersigned counsel was appointed by the Fourth Circuit Court of Appeals, pursuant to the Criminal Justice Act, to represent the Defendant.

2. In order to prepare for and conduct this appeal, Defendant's counsel requires access to the full record, including the transcript of the Re-arraignement hearing and the Plea Agreement Supplement listed above.

3. The deadline for Defendant's Opening Brief and Joint Appendix is September 26, 2019. Expedited access to the sealed transcripts is necessary in order to prepare these documents.

WHEREFORE, Defendant requests that the Court grant undersigned counsel expedited access to the transcript of the Re-arraignement hearing held on October 10, 2017 and the Plea Agreement Supplement entered on October 10, 2017 in order to meet the September 26, 2019 deadline referenced above.

Dated: September 16, 2019

Respectfully submitted,

/s/Dennis E. Boyle

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Counsel for Defendant Jemell Lamar Rayam

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all registered CM/ECT users in this matter.

/s/Dennis E. Boyle

Dennis E. Boyle